

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-60

REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

DATE: December 30, 2003

MCI-CLEC 1-1: Please state whether you are an incumbent local exchange provider (“ILEC”) or are an affiliate of an ILEC providing telecommunications service in Massachusetts. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. § 153(1)

Respondent: Patricia Jacobs

RESPONSE: AT&T Communications of New England, Inc. (“AT&T”) is neither an ILEC nor an affiliate of an ILEC.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

DATE: December 30, 2003

MCI-CLEC 1-2: Please state whether you are an affiliate of a competitive local exchange carrier ("CLEC") providing telecommunications service in Massachusetts. If you are an affiliate of an CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1)

Respondent: Patricia Jacobs

RESPONSE: AT&T is certified to provide competitive local exchange services in Massachusetts.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-3: Do you lease 2-wire voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a DS-1.)

Respondent: Pamela Brander

RESPONSE: Yes.

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MCI-CLEC 1-4: Do you use non-ILEC switches to provide local exchange service to Massachusetts customers? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a DS-1.)

Respondent: Pamela Brander

RESPONSE: Yes.

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MCI-CLEC 1-5: To the extent that you have not already provided this information in response to the Massachusetts Department of Telecommunications and Energy's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers

- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
- b. V&H coordinates;
- c. street address, city and zip code;
- d. currently equipped line side capacity in
  - i. DS-0/voice grade circuits and
  - ii. DS-1 circuits;
- e. currently utilized line side capacity in
  - i. DS-0/voice grade circuits and
  - ii. DS-1 circuits;
- f. current switch processor capacity in CCS;
- g. busy hour and busy season utilized switch processor capacity in CCS;
- h. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

Respondent: Pamela Brander

RESPONSE:

For the information sought by parts (a), (c), and (h) of this request, please see AT&T's response to the Department's October 9, 2003 information request DTE-ATT-14. Please further note that the four switches that were identified in this response as providing local service but whose functions were not listed are all stand-alone switches.

b. Please consult the LERG for the V&H coordinates of these switches.

d, e, f, and g. AT&T is continuing to investigate to determine whether information responsive to these information requests is available in the form requested.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-6: Using the switches identified in CLEC-5:

a: Do you currently provide local exchange service to residential customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].

b. Do you currently provide local exchange service to business customers in Massachusetts? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.

c: Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Product Name	Available to Res. Customers?	Available to Bus. Customers?	Retail Price?	Bundled with LD or DSL Service?	Available as Standalone Local Product?	Currently Advertising?	Currently Marketing?
[Name of product]	[Yes/No]	[Yes/No]	[\$X.XX ]	[Yes/No]	[Yes/No]	[Yes/No]	[Yes/No]

d. For each switch identified in CLEC-5 other than circuit switches, please provide the following additional information regarding the local exchange service that you provide:

i. How many telephony customers do you serve via that switch?

ii. To what percentage of those customers do you

provide standalone local exchange service (i.e. no broadband, no cable television)? What is the retail price for this service?

- iii. To what percentage of those customers do you provide local exchange service and broadband service but not cable television service? What is the price for this service?
- iv. To what percentage of those customers do you provide local exchange service and cable television service but not broadband service? What is the price for this service?

To what percentage of those customers do you provide local exchange service, cable television service, and broadband service? What is the price for this service?

Respondent: Catherine Montfort, Pamela Brander

RESPONSE:

a. AT&T does not use non-ILEC switches to provide local exchange service to residential customers in Massachusetts.

b. AT&T uses its own switches to provide local exchange service in Massachusetts over analog voice-grade loops to business customers, primarily to small business mass market customers.

AT&T Business Services primarily uses two marketing methods for its business mass market offering: direct telemarketing and direct marketing (“feet on the street”). These functions are primarily provided through contracts with independent firms using material developed by the AT&T Business Services product team.

c. AT&T’s offering to business mass market customers is its All-in-One product. As described above, AT&T does market the All-in-One product in Massachusetts. Information about AT&T Business Services products may be obtained at <http://www.serviceguide.att.com/ABS/ext/index.cfm>.

d. All of AT&T’s switches in Massachusetts are circuit switches.



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MCI-CLEC 1-7: Please provide, on a statewide, CLEC switch CLLI-code, and Verizon wire center basis, on a monthly or quarterly basis, for the most recent 12-month period, the number of:

- a. Newly installed business lines served by unbundled loops;
  - i. Number of such lines that were migrated from the ILEC's retail service.
  - ii. Number of such lines that were migrated from a CLEC's retail service.
- b. Newly installed business lines served by UNE-P;
  - i. Number of such lines that were migrated from the ILEC's retail service.
  - ii. Number of such lines that were migrated from a CLEC's retail service.
- c. Newly installed business lines served by non-circuit switches;
  - i. Number of such lines that were migrated from the ILEC's retail service.
  - ii. Number of such lines that were migrated from a CLEC's retail service.
- d. Newly installed residential lines served by unbundled loops;
  - i. Number of such lines that were migrated from the ILEC's retail service.

- ii. Number of such lines that were migrated from a CLEC's retail service.
- e. Newly installed residential lines served by UNE-P.
  - i. Number of such lines that were migrated from the ILEC's retail service.
  - ii. Number of such lines that were migrated from a CLEC's retail service.
- f. Newly installed residential lines served by non-circuit switches;
  - i. Number of such lines that were migrated from the ILEC's retail service.
  - ii. Number of such lines that were migrated from a CLEC's retail service.

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

Respondent: Catherine Montfort, Keith Snyder, Pamela Brander

RESPONSE:

- a & b. Please see the supplemental response that AT&T filed on January 20, 2004 to the information request Joint Parties-ATT-8.
- c. All of AT&T's switches in Massachusetts are circuit switches.
- d. AT&T does not offer residential UNE-L service in Massachusetts.
- e. AT&T began to offer residential UNE-P service in Massachusetts less than 9 months ago; all of AT&T's residential UNE-P lines are therefore newly installed.
- f. All of AT&T's switches in Massachusetts are circuit switches.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-8: Please provide, on a statewide, CLEC switch CLLI-code, and Verizon wire center basis, for the most recently available time period, the total number of:

- a. Active business lines served by unbundled loops;
- b. Active business lines served by UNE-P;
- c. Active business lines served by non-circuit switches;
- d. Active residential lines served by unbundled loops;
- e. Active residential lines served by UNE-P;
- f. Active residential lines served by non-circuit switches.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 level or above loops in your response.

Respondent: Catherine Montfort, Keith Snyder

RESPONSE: Please see the response that AT&T filed on January 16, 2004 to the information request Joint Parties-ATT-9.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New  
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MCI-CLEC 1-9: If you do not currently offer service to business customers in  
Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops),  
please list and describe your reasons for not doing so.

Respondent:

RESPONSE: Not applicable.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-10: If you currently offer service to business customers in Massachusetts below the DS-1 level (i.e., DS-0/voice grade loops), but do not offer and/or market service to such customers unless they have or need a certain minimum number of loops to their premises, please state that minimum number, and list and describe your reasons for not offering and/or marketing service below that level.

Respondent:

RESPONSE: Not applicable.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New  
England, Inc.

DATE: December 30, 2003

MCI-CLEC 1-11: For each switch identified in your response to CLEC-5, please provide  
the information requested in TABLES 1A, 1B, and 1C. If you are unable  
to provide information responsive to all three tables, please provide  
responsive information to the extent it is available. Please do not include  
T-1 level or above loops in your response.

TABLE 1A

CLEC Switch CLLI	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers <sup>1</sup>	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers <sup>2</sup>
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	. . . (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

<sup>1</sup> This category includes loops used for fax and/or modem-only traffic.

<sup>2</sup> This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

TABLE 1B

ILEC Wire Center	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers <sup>3</sup>	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers <sup>4</sup>
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	. . . (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

<sup>3</sup> This category includes loops used for fax and/or modem-only traffic.

<sup>4</sup> This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).



TABLE 1C

State Of Massachu setts	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers <sup>5</sup>	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers <sup>6</sup>
	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	. . . (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

<sup>5</sup> This category includes loops used for fax and/or modem-only traffic.

<sup>6</sup> This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

Respondent: Catherine Montfort

RESPONSE:

Please see the response that AT&T filed on January 16, 2004 to the information request Joint Parties-ATT-10.

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DATE: December 30, 2003

MCI-CLEC 1-12: For each switch identified in your response to CLEC-5 other than circuit switches, please provide the following for each switch:

- a. the date(s) on which you installed the switch and began providing local exchange service on the switch;
- b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
- c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

Respondent: Pamela Brander

RESPONSE: All of AT&T's switches in Massachusetts are circuit switches.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

DATE: December 30, 2003

MCI-CLEC 1-13: Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products, either by geography, class of customer, or otherwise? If so, please explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

Respondent: Patricia Jacobs

RESPONSE: Availability of local exchange service is limited based upon, for example, available facilities, billing, technical and geographic capability, as described in AT&T's local tariffs available at <http://serviceguide.att.com>. Among other things, AT&T's tariff provides that "Services, features and functions will be provided where facilities, including but not limited to, billing capability, technical capability and the ability of the Company to purchase unbundled network elements ("UNEs") (as that term is defined by applicable law), either alone or in combination (including a combination of unbundled switching with other UNEs), are available. AT&T reserves the right to withdraw any service provided pursuant to this tariff or to modify its terms and conditions, upon 30 days notice, in the event that changes occur (including regulatory changes) which affect either the availability of facilities to AT&T, or the terms and conditions upon which they are obtained. The foregoing is in addition to all other existing rights retained by AT&T to modify or withdraw its services at any time."

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New  
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DATE: December 30, 2003

MCI-CLEC 1-14: Have you made any changes to your Massachusetts intrastate tariffs in  
the last 24 months that would limit the availability of your local exchange  
service, either by restricting the geographic area in which you offer your  
service, restricting the customers to whom you service is available, or  
otherwise? If so, please explain.

Respondent: Patricia Jacobs

RESPONSE: See the response to MCI-CLEC 1-13.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-15: Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating “Yes” or “No” in each box.

	TO VZ voice only	TO VZ voice plus DSL	TO VZ DSL only	TO CLEC UNE-P voice only	TO CLEC switch- based voice only	TO CLEC line sharing	TO CLEC line splitting	TO CLEC DSL only
FROM VZ voice only								
FROM VZ voice plus DSL								
FROM VZ DSL only								
FROM CLEC UNE-P voice only								
FROM CLEC switch- based voice only								
FROM CLEC line sharing								
FROM CLEC line splitting								
FROM CLEC DSL only								

Respondent: Keith Snyder, Catherine Montfort

RESPONSE:                    Please see the response that AT&T filed on January 16, 2004 to the information request Joint Parties-ATT-13.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-16: Please explain whether you have always been able to obtain a customer service record (“CSR”) from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

Respondent: Keith Snyder, Catherine Montfort

RESPONSE: These records usually can be obtained from Verizon if Verizon is providing the underlying retail service, although Verizon may require customer authorization for release. The records are not always available, however, for reasons such as Verizon’s systems being “down” or, in cases involving a parsed CSR, the account is not eligible for parsing or is too large. Verizon will not provide CSRs for customers being served by a CLEC through a UNE-L arrangement on the ground that the information is third-party proprietary data.



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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-17: Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Respondent: Keith Snyder, Catherine Montfort

RESPONSE: Please see the supplemental response that AT&T filed on January 20, 2004 to the information request Joint Parties-ATT-15.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-18: Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Respondent: Keith Snyder, Catherine Montfort

RESPONSE: Please see the supplemental response that AT&T filed on January 20, 2004 to the information request Joint Parties-ATT-16.

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REQUEST: WorldCom, Inc Information Requests to AT&T Communications of New England, Inc.

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MCI-CLEC 1-19: Please explain whether you currently have in place and use electronic automated systems to:

- a: Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c: Maintain and repair service for customers whose service is provisioned using your own switches.
- d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- e. Conduct testing for customer services provisioned via your own switches using UNE loops.
- f. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

Respondent: Roslyn Brewer

RESPONSE: Please see the supplemental response that AT&T filed on January 23, 2004 to the information request Joint Parties-ATT-17.